

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re)	
)	
)	Chapter 9
CITY OF DETROIT, MICHIGAN)	
)	Case No.: 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	
)	
)	

**CORRECTED CITY OF DETROIT, MICHIGAN’S OBJECTIONS AND
RESPONSES TO DETROIT RETIREMENT SYSTEMS’
REQUESTS FOR ADMISSION
DIRECTED TO THE CITY OF DETROIT, MICHIGAN**

Pursuant to Federal Rules of Civil Procedure 26 and 36, as made applicable to this proceeding by the Federal Rules of Bankruptcy Procedure 7026, 7036, and 9014(c), the City of Detroit (the “City”) hereby submits the following objections and responses to the Request for Admissions to the City (the “Requests”) propounded by the Police and Fire Retirement System of the City of Detroit (“PFRS”) and the General Retirement System of the City of Detroit (“GRS”) (collectively, “Retirement Systems”).

REQUESTS FOR ADMISSION

1. Admit that the City does not have the right to set the discount rate or assumed rate of return used by the PFRS or the GRS for investment policy and/or actuarial purposes.

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION

NO. 1:

The City objects as this Request calls for a legal conclusion. Accordingly the City denies the Request.

2. Admit that the City does not have the right to reconstitute the boards of the PFRS or the GRS.

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION

NO. 2:

The City objects as this Request calls for a legal conclusion. Accordingly the City denies the Request.

3. Admit that the City cannot reconstitute the boards of trustees of the PFRS and the GRS without legislative changes.

OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION

NO. 3:

The City objects as this Request calls for a legal conclusion. Accordingly the City denies the Request.

4. Admit that the City does not have the right to set investment or governance policies of the GRS or the PFRS.

**OBJECTION AND RESPONSE TO REQUEST FOR ADMISSION
NO. 4:**

The City objects as this Request calls for a legal conclusion. Accordingly the City denies the Request.

Dated: May 6, 2014

Respectfully submitted,

/s/ David G. Heiman

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

Thomas F. Cullen, Jr. (DC 224733)

Gregory M. Shumaker (DC 416537)

Geoffrey S. Stewart (DC 287979)

JONES DAY

51 Louisiana Ave., N.W.

Washington, D.C. 20001

Telephone: (202) 879-3939

Facsimile: (202) 626-1700

tfcullen@jonesday.com

gshumaker@jonesday.com
gstewart@jonesday.com

Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7300
Facsimile: (248) 359-7700
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY OF DETROIT

EXHIBIT A

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re)	
)	
)	Chapter 9
CITY OF DETROIT, MICHIGAN)	
)	Case No.: 13-53846
)	
Debtor.)	Hon. Steven W. Rhodes
)	
)	
)	

CERTIFICATE OF SERVICE

The undersigned certifies that on May 6, 2014, the Detroit Retirement Systems' Requests for Admission Directed to the City of Detroit, Michigan was filed using the Court's CM/ECF system, which CM/ECF system will send notification of such filing to all parties of record.

Dated: May 6, 2014

Respectfully submitted,

/s/ David G. Heiman

David G. Heiman (OH 0038271)

Heather Lennox (OH 0059649)

JONES DAY

North Point

901 Lakeside Avenue

Cleveland, Ohio 44114

Telephone: (216) 586-3939

Facsimile: (216) 579-0212

dgheiman@jonesday.com

hlennox@jonesday.com

Bruce Bennett (CA 105430)

JONES DAY

555 South Flower Street

Fiftieth Floor

Los Angeles, California 90071

Telephone: (213) 243-2382

Facsimile: (213) 243-2539

bbennett@jonesday.com

Thomas F. Cullen, Jr. (DC 224733)
Gregory M. Shumaker (DC 416537)
Geoffrey S. Stewart (DC 287979)
JONES DAY
51 Louisiana Ave., N.W.
Washington, D.C. 20001
Telephone: (202) 879-3939
Facsimile: (202) 626-1700
tfcullen@jonesday.com
gshumaker@jonesday.com
gstewart@jonesday.com

Robert S. Hertzberg (P30261)
Deborah Kovsky-Apap (P68258)
PEPPER HAMILTON LLP
4000 Town Center, Suite 1800
Southfield, MI 48075
Telephone: (248) 359-7300
Facsimile: (248) 359-7700
hertzbergr@pepperlaw.com
kovskyd@pepperlaw.com

ATTORNEYS FOR THE CITY OF DETROIT

WAI-3171778v2